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Attorneys for defendant  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
YCD MULTIMEDIA, INC.,  
:

Plaintiff.,  
:

- against -  
:

INTEGRATED MEDIA SYSTEMS, INC. d/b/a  
BE MEDIA, and SEATAC DIGITAL RESOURCES,  
INC.,  
:

Defendants.  
:  
:

Case No. 09 CIV 10124  
ECF CASE  
(RH JCS)

-----X  
**DEFENDANT SEATAC DIGITAL RESOURCES, INC.'S ANSWER  
TO CROSS-CLAIM FILED BY DEFENDANT INTEGRATED  
MEDIA SYSTEMS, INC. d/b/a BE MEDIA**

Seatac Digital Resources, Inc. ("Seatac"), as and for its answer to the crossclaim of  
defendant Integrated Media Systems, Inc. d/b/a Be Media ("Be Media"), dated January 26, 2010  
(the "Crossclaim"), respectfully:

1. Denies the allegations contained in ¶¶ 46 and 47 of the Crossclaim.<sup>1</sup>

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<sup>1</sup> No response is required to ¶¶ 1 through 45 because ¶¶ 1 through 26 constitute Be Media's answer to the plaintiff's complaint in this action and ¶¶ 27 through 44 constitute Be Media's counterclaim against the plaintiff.

**AS AND FOR SEATAC'S FIRST AFFIRMATIVE DEFENSE**

2. The Crossclaim fails to state a claim.

**AS AND FOR SEATAC'S SECOND AFFIRMATIVE DEFENSE**

3. The Crossclaim should be dismissed for lack of personal jurisdiction

**AS AND FOR SEATAC'S THIRD AFFIRMATIVE DEFENSE**

4. The Crossclaim should be dismissed for improper venue.

**AS AND FOR SEATAC'S FOURTH AFFIRMATIVE DEFENSE**

5. The Crossclaim is barred by the doctrines of estoppel and waiver.

WHEREFORE, Seatac respectfully requests entry of an order dismissing the Crossclaim with prejudice and awarding fees and costs to Seatac and granting Seatac such other and further relief as is just and proper.

Dated: March 4, 2010  
New York, New York

Respectfully submitted,

CROWELL & MORING LLP  
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By: 

Bruce J. Zabarauskas